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Attorneys for Defendant
HILTON WORLDWIDE HOLDINGS INC.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

VISHAL SHAH, JONATHAN GABRIELLI, and
CHRISTINE Q. WILEY, as individuals, on behalf
of themselves, the general public, and those
similarly situated,

Plaintiffs,

vs.

HILTON WORLDWIDE HOLDINGS INC.,

Defendant.

Case No.: 5:25-cv-1018-EKL-SVK

**STIPULATION RE: AWARD OF
SANCTIONS ON HILTON HOLDINGS'
MOTION FOR SANCTIONS**

Plaintiffs Vishal Shah, Jonathan Gabrielli, and Christine Q. Wiley ("Plaintiffs"), and Defendant Hilton Worldwide Holdings Inc. ("Hilton Holdings") (together, the "Parties"), by and through their respective attorneys, pursuant to Local Civil Rule 7-12, hereby stipulate and agree to the following:

WHEREAS, Plaintiffs filed their Complaint on Jan. 31, 2025, in the United States District Court for the Northern District of California; Hilton Holdings filed a Motion to Dismiss the Complaint (ECF No. 20), and the Court dismissed Plaintiffs' Complaint "based on a lack of personal

jurisdiction” on June 11, 2025 (ECF No. 30); Plaintiffs filed their Amended Complaint on June 25, 2025 (ECF No. 31); and Hilton Holdings filed their Motion to Dismiss the Amended Complaint on July 9, 2025 (ECF No. 33), which was heard by the Court on September 10, 2025 (ECF No. 44);

WHEREAS, Hilton Holdings also filed a Motion to Transfer Venue (ECF No. 52) and a Motion for Sanctions (ECF No. 54) on October 3, 2025;

WHEREAS, the Court held a hearing on Hilton Holdings’ Motion to Transfer Venue and Motion for Sanctions on November 21, 2025 (*see* ECF No. 77), during which it suggested that monetary sanctions against Plaintiffs and Plaintiffs’ Counsel are appropriate and ordered the Parties to meet and confer to determine if an award of \$10,000 was mutually acceptable, or submit evidence as to the amount of sanctions to be awarded;

WHEREAS, the Parties and Plaintiffs’ Counsel met and conferred regarding the pending Motion for Sanctions on November 24, 2025;

NOW THEREFORE, the Parties and Plaintiffs’ Counsel hereby stipulate that:

1. Plaintiffs’ Counsel shall pay Hilton Holdings \$10,000 in attorneys’ fees (which accounts for approximately \$8,000 for researching Plaintiffs’ Hilton Honors status and in connection with requests, correspondence, and meetings with Plaintiffs’ Counsel to obtain Plaintiffs’ information to verify their Hilton Honors status, and approximately \$2,000 for time preparing for and appearing at the hearing on Hilton Holdings’ Motion to Dismiss the Amended Complaint) within fourteen days of the Court’s order on this Stipulation.

IT IS SO STIPULATED.

Respectfully submitted,

DLA PIPER LLP (US)

Dated: November 26, 2025

By: /s/ Isabelle Ord

ISABELLE ORD
MATTHEW C. DANAHER
ASHLEY L. BARTON

Attorneys for Defendant
HILTON WORLDWIDE HOLDINGS
INC.

GUTRIDE SAFIER LLP

Dated: November 26, 2025

By: /s/Anthony J. Patek/

SETH A. SAFIER
MARIE A. McCRARY
TODD KENNEDY
ANTHONY J. PATEK

Attorneys for Plaintiffs
VISHAL SHAH, JONATHAN
GABRIELLI, and CHRISTINE Q.
WILEY

ATTESTATION PURSUANT TO LOCAL RULE 5-1(i)(3)

I, Anthony Patek, hereby attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the contents of this filing and have authorized it.

By: /s/ Anthony J. Patek

Anthony Patek

[PROPOSED] ORDER

Pursuant to the Parties' Stipulation, and good cause appearing, the Court hereby GRANTS Hilton Holdings' Motion for Sanctions (ECF No. 54) in part, according to the parameters below, and the Parties' Stipulation. It is HEREBY ORDERED that:

1. Plaintiffs' Counsel shall pay Hilton Holdings \$10,000 in attorneys' fees within fourteen days of the Court's order on this Stipulation.

IT IS SO ORDERED.

Dated: _____

Hon. Eumi K. Lee
Northern District of California